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8 **UNITED STATES DISTRICT COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

10
 11 A.H. and H.H., in each case a minor, by
 and through their guardian ad litem,
 12 Crystal Hanson, individually and as
 successor in interest to Shane Holland,
 13 deceased; C.H., a minor, by and through
 her guardian ad litem, Reymi Updike,
 14 individually and as successor in interest
 to Shane Holland, deceased, and
 15 PATRICIA HOLLAND, individually,

16 Plaintiff,

17 v.

18 COUNTY OF SAN BERNARDINO;
 JUSTIN LOPEZ and DOES 1-10,
 19 inclusive

20 Defendant.

Case No. 5:23-cv-01028-JGB (SHKx)

District Judge: Jesus G. Bernal
 Magistrate Judge: Shashi H.
 Kewalramani

**DECLARATION OF KAYLEIGH
 ANDERSEN IN SUPPORT OF
 DEFENDANTS' MOTION FOR A
 TEMPORARY STAY OF
 DISCOVERY PENDING THE
 CALIFORNIA DEPARTMENT OF
 JUSTICE CRIMINAL
 INVESTIGATION**

Date: January 8, 2024
 Time: 9:00 a.m.
 Judge: Jesus G. Bernal
 Crtrm: 1

DECLARATION OF KAYLEIGH ANDERSEN

I, Kayleigh Andersen, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an attorney with Manning & Kass, Ellrod, Ramirez, Trester LLP, attorneys of record for Defendants County of San Bernardino and Officer Justin Lopez. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto. I make this declaration in support of Defendants County of San Bernardino and Officer Justin Lopez' Motion for a Temporary Stay of Discovery Pending the California Department of Justice Criminal Investigation.

2. On November 20, 2023, I searched the California Department of Justice's ("CA DOJ") website to find information related to the officer-involved shooting investigation of Mr. Shane Holland's death.

3. To try and determine an estimated timeframe in which these investigations are completed, I searched various articles and policies on the CA DOJ's website. While I did not find information related to the timeline of these investigations, I did find additional information on the California Police Shooting Investigation Team ("CaPSIT"), the team charged with conducting investigations into officer-involved shootings, cited in this motion at <https://oag.ca.gov/bi/capsit>. A true and correct copy of the article titled "California Police Shooting Investigation Team (CaPSIT) Program" is attached hereto as **Exhibit A**.

4. I also searched the "Current Cases" page of the CA DOJ's website at <https://oag.ca.gov/ois-incidents/current-cases> to find the list of currently pending investigations. Accordingly, the website confirms that Mr. Holland's case is currently under investigation. A true and correct copy of the CA DOJ's current officer-involved shooting investigations is attached hereto as **Exhibit B**.

5. In an additional attempt to obtain an estimated timeframe in which the investigation regarding Mr. Holland's death would be completed, Defendants

1 contacted the CA DOJ. Unfortunately, the department was unable to provide any
2 such timeline.

3 6. Additionally, I reviewed the CA DOJ's case archive of closed cases
4 which I found at the website <https://oag.ca.gov/ois-incidents/case-archive> on
5 November 20, 2023. A true and correct copy of the CA DOJ's case archive of officer
6 involved shooting investigations is attached hereto as **Exhibit C**.

7 7. I then clicked on each of the four archived cases to determine when the
8 reports were issued and determined that the time it takes the CA DOJ to complete its
9 officer-involved shooting investigations has ranged from 16 months to 25 months.
10 The following information is true and accurate as calculated to the best of my ability
11 on November 20, 2023:

- 12 A. Case BI-LA2021-00017:
Opened: July 15, 2021
Report Issued: November 2022
Investigation Length: 16 months
- 13 B. Case BI-LA2021-00021
Opened: August 21, 2021
Report Issued: January 2023
Investigation Length: 17 months
- 14 C. Case BI-LA2021-00027
Opened: September 28, 2021
Report Issued: May 2023
Investigation Length: 18 months
- 15 D. Case BI-RI2021-00030
Opened: September 28, 2021
Report Issued: November 2023
Investigation Length: 25 months

16 8. The CA DOJ website provides that four reports have been issued
17 indicated that these investigations are now closed. As of this date, there are only
18 thirteen cases preceding the investigation into the death of Mr. Shane Holland. **See**
19 **Exhibit B at pp. 8-10.**

20 9. Prior to filing the instant motion, I informed Plaintiffs' Counsel that
21 Defendants intended to seek a stay of discovery as to Defendant Officer Justin
22 Lopez. Subsequently, our office sent a formal meet and confer letter on October 19,

2023, describing in detail the grounds upon which a motion would be brought seeking the same. A true and correct copy of the meet and confer letter our office sent is attached hereto as **Exhibit D**.

10. On October 26, 2023, Plaintiffs' Counsel, Ms. Renee Valentine advised Defendants that Plaintiffs would not agree to a stay. A true and correct copy of Plaintiffs' Counsel's email declining to agree to a stay is attached hereto as **Exhibit E**.

11. In an effort to provide Plaintiffs with requisite discovery, while protecting Defendants' interests, particularly Defendant Officer Justin Lopez's rights, Defendants offered to enter into a Stipulated Protective Order with Plaintiffs and agreed to produce certain records pursuant to that agreement.

12. As such, the parties entered a Stipulated Protective Order on or about October 26, 2023. Subsequently, and pursuant to this protective order, Defendants on November 3, 2023, produced a substantial amount of evidence to Plaintiff including, but not limited to: (1) Defendant Officer Lopez's belt recording of the incident; (2) the transcript of the belt recording; (3) Officer Rios' belt recordings 1 and 2; (4) Officer Hillebrand's belt recordings 1, 2, and 3; (5) Deputy Rivas' belt recording; (6) photos of the scene and evidence; (7) the homicide investigation by San Bernardino's Sheriff's Officer, including reports, and CCTV video from the surrounding area; (8) Post Profile re: Lopez, J.; (9) San Bernardino Sheriff's Department Manual Master; (10) Interview of Robert Hanson and transcript of the same; (11) Interviews of Sgt. Rios, Dep. Hillebrand; (12) Coroner Investigation; (13) autopsy and corresponding reports; (13) numerous other reports, including the Initial Incident Report and supplemental reports. Additional evidence was produced and is listed in full in Defendants First Supplemental Disclosures Pursuant to Federal Rule of Civil Procedure 25(A)(1) served to Plaintiffs on November 3, 2023.

13. Defendants now seek a temporary stay of discovery as to Defendant Officer Justin Lopez to protect his rights and prohibit infringement.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 30th day of November, 2023, at Los Angeles, California.

/s/ Kayleigh Andersen
Kayleigh Andersen

EXHIBIT A



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ROB BONTA

Attorney General

California Police Shooting Investigation Team (CaPSIT) Program

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On September 30, 2020, Assembly Bill (AB) 1506 was signed into law, which required the California Department of Justice (DOJ) to investigate all incidents of an officer involved shooting (OIS) resulting in the death of an unarmed civilian. This mandate went into effect on July 1, 2021. The Division of Law Enforcement's (DLE) California Police Shooting Investigation Team (CaPSIT), working collaboratively with the respective local law enforcement agency, will be responsible for the criminal AB 1506 investigation from the inception to the conclusion. The investigation will include the totality of the circumstances and analysis per California Penal Code § 835a, along with legal review by the California Attorney General's Office.

All AB 1506 investigations shall be conducted as fact-based investigations built on the foundations of objectivity and transparency. The CaPSIT will utilize to the fullest capacity those leading investigative techniques and technological resources to ensure the highest OIS investigative industry standards. Such investigations can often last unabated for several days or longer depending on the circumstances involved in each

unique situation. The goal of the CaPSIT program is to produce the most comprehensive, thorough, accurate and timely investigation possible which can be confidently relied upon by all Californians.

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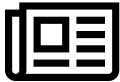
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EXHIBIT B



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ROB BONTA
Attorney General

Current Cases

Current Cases Under Review by the California Department of Justice

Pursuant to California Assembly Bill 1506 (AB 1506), the California Department of Justice is required to investigate all incidents of an officer-involved shooting resulting in the death of an unarmed civilian in the state. The California Department of Justice will investigate and review for potential criminal liability all such incidents.

All cases currently being handled by the California Department of Justice under AB 1506 will be listed here as soon as possible. During the immediate aftermath of a critical incident, the initial point of contact will typically be the local responding agency.

DOJ Case Number	Case Details	Status
BI-RI2023-00057	Date: 11/19/2023 Decedent: Unidentified Agency: California Highway Patrol Location: I-105/Wilmington Exit, Lynwood, Los Angeles County	Under Investigation

DOJ Case Number	Case Details	Status
BI-RI2023-00017	Date: 11/11/2023 Decedent: Jaime Valdez Agency: Fontana Police Department Location: 7197 Big Sur Street, Fontana, San Bernardino County Involved Officer: Alex Yanez	Under Investigation
BI-LA2023-00053	Date: 10/29/2023 Decedent: Abigail Crystal Lopez Agency: Anaheim Police Department Location: Anaheim Boulevard & Ball Road, Anaheim	Under Investigation
BI-SF2023-00013	Date: 09/17/2023 Agency: California Highway Patrol Location: Humboldt County in the City of Hoopa	Under Investigation
BI-SA2023-00068	Date: 09/11/2023 Agency: Stockton Police Department Location: Intersection of N Pershing Ave & W Fremont St Stockton, CA 95203 Involved Officer: Marcos Alonzo	Under Investigation
BI-RI2023-00011	Date: 08/31/2023 Decedent: Elizandro Vargas Agency: El Centro Police Dept. Location: 1900 Block of Ocotillo Drive, El Centro Involved Officer: Adrian Hiraes	Under Investigation
BI-SF2023-00012	Date: 08/18/2023 Decedent: Tahmon Wilson Agency: Martinez Police Department Location: 4808 Sunrise Drive, Martinez, CA Involved Officer: Cole Bennett, Alexander Tirona, Marc Kahue, Raul Ceja-Mendez	Under Investigation

DOJ Case Number	Case Details	Status
BI-SA2023-00048	Date: 07/03/2023 Agency: California Highway Patrol and Alameda County Sheriff's Office Location: 1600 Block 163rd Avenue at Liberty Street, Ashland, Alameda County	Under Investigation
BI-LA2023-00020	Date: 05/27/2023 Agency: Burbank Police Department Location: 1200 S. Flower Street, Burbank Involved Officer: Peter Choi, Jose Placencia, Geovanni Fabian	Under Investigation
BI-LA2023-00018	Date: 04/28/2023 Decedent: Michael Owens Agency: Oxnard Police Department Location: 235 E. 17th Street, Oxnard Involved Officer: Manuel Garcia	Under Investigation
BI-SF2023-00006	Date: 04/29/2023 Decedent: Jesus Guzman Jr. Agency: California Highway Patrol Location: I-5 Southbound / County Road 33, Glenn County Involved Officer: Steve Bryant	Under Investigation
BI-SF2023-00037	Date: 04/16/2023 Decedent: Joel Villegas Agency: Tulare Police Department Location: Bardsley Avenue and Vetter Street, Tulare Involved Officer: Daniel Bradley, Adan Barragan	Under Investigation

DOJ Case Number	Case Details	Status
BI-SF2023-00005	Date: 04/13/2023 Decedent: Elmer Lopez-Castaneda Agency: Newark Police Dept. and Fremont Police Dept. (Alameda County) Location: 39150 Cedar Boulevard (Cedar Boulevard and Mowry Avenue), Newark Involved Officer: Thomas Degenstien, Anthony Piol, Jessie Hartman, and Trevor Damewood	Under Investigation
BI-LA2023-00013	Date: 04/05/2023 Decedent: Victor Eduardo Nava Agency: Southgate Police Department Location: 5600 Block District Boulevard, Vernon (Los Angeles County)	Under Investigation
BI-RI2023-00006	Date: 03/18/2023 Decedent: Guillermo Huerta Agency: Bakersfield Police Department Location: Bakersfield, Kern County Involved Officer: Bradley Mouser	Under Investigation
BI-LA2023-00010	Date: 03/12/2023 Decedent: Kyle Sostek Agency: San Bernardino County Sheriff's Department Location: Big Bear, San Bernardino County Involved Officer: Samuel Fuller	Under Investigation
BI-SF2023-00002	Date: 03/04/2023 Decedent: Roberto Corchado Agency: Fresno Police Department Location: Fresno, California Involved Officer: Bryce Hammond and Luke Tran	Under Investigation

DOJ Case Number	Case Details	Status
BI-LA2023-00008	Date: 02/10/2023 Decedent: Austin Heiselman Agency: Fullerton Police Department Location: La Habra, California Involved Officer: Nicholas Ashman, Mathew Green, Joshua Walker, and Juan Arenas	Under Investigation
BI-SA2023-00022	Date: 02/09/2023 Decedent: David Lawrence Couch III Agency: California Highway Patrol Location: Redding, California Involved Officer: Ryan Cates	Under Investigation
BI-LA2023-00005	Date: 01/22/2023 Decedent: Charles Robert Towns Agency: Los Angeles County Sheriff's Department Location: Altadena, California Involved Officer: Clarissa Prentice and Eliezer Morales	Under Investigation
BI-LA2023-00004	Date: 01/11/2023 Decedent: Christopher Lee Mercuio Agency: Los Angeles County Sheriff's Department Location: Santa Clarita, California Involved Officer: Lorena Gonzalez	Under Investigation
BI-RI2023-00001	Date: 01/11/2023 Decedent: Samuel Arredondo Agency: San Bernardino County Sheriff's Department Location: Joshua Tree, California Involved Officer: Aimee Coakley and Tyler Gilbert	Under Investigation

DOJ Case Number	Case Details	Status
BI-RI2022-00091	Date: 12/20/2022 Agency: Bakersfield Police Department Location: Bakersfield, California Involved Officer: Andrew Ferguson, James King, Chad Rogers, Cortez Summit, Anthony Flores, Nicholas Ashby, Dominic Ramirez, and Scott Lazenby	Under Investigation
BI-LA2022-00049	Date: 12/18/2022 Decedent: Guillermo Medina Agency: Culver City Police Department Location: Culver City, California Involved Officer: Adam Rios	Under Investigation
BI-SF2022-00016	Date: 12/17/2022 Decedent: Victor Marquez Melendez Agency: Woodlake Police Department Location: Exeter, California Involved Officer: Chris Kaious and Juan Gonzales	Under Investigation
BI-LA2022-00046	Date: 12/08/2022 Decedent: John Ray Romero Agency: San Diego Police Department Location: San Diego, California Involved Officer: Gregory Bergman, Jonathan Estrada, and Michael Thornton	Under Investigation
BI-LA2022-00038	Date: 09/27/2022 Decedent: Savannah Graziano and Anthony John Graziano Agency: San Bernardino County Sheriff's Department Location: Hesperia, California	Under Investigation

DOJ Case Number	Case Details	Status
BI-LA2022-00035	Date: 09/17/2022 Decedent: Luis Herrera Agency: Los Angeles Police Department Location: Los Angeles, California Involved Officer: Luis Navarette	Under Investigation
BI-LA2022-00027	Date: 07/27/2022 Decedent: Marcos Maldonado Agency: Los Angeles Police Department Location: Los Angeles, California Involved Officer: David Gillardo and Alonso Vasques	Under Investigation
BI-RI2022-00022	Date: 07/22/2022 Decedent: Jay Jackson Agency: Riverside County Sheriff's Department Location: Moreno Valley, California Involved Officer: Robert Carrasco	Under Investigation
BI-LA2022-00025	Date: 07/15/2022 Decedent: Trent William Millsap Agency: Westminster Police Department Location: Anaheim, California Involved Officer: Miguel Gradilla and Alejandro Lopez	Under Investigation
BI-SF2022-00007	Date: 07/13/2022 Decedent: Curtis Dale Barnett Agency: Salinas Police Department Location: Salinas, California Involved Officer: Gabriel Garcia, Alejandro Jimenez, Eduardo Bejarano, and Jordy Urrutia	Under Investigation
BI-LA2022-00022	Date: 06/21/2022 Decedent: Darnell Trevon Travis Agency: Fontana Police Department Location: Fontana, California Involved Officer: Alex Millian	Under Investigation

DOJ Case Number	Case Details	Status
BI-LA2022-00020	Date: 06/21/2022 Decedent: Earl Shane Holland Agency: San Bernardino County Sheriff's Department Location: Adelanto, California Involved Officer: Justin Lopez	Under Investigation
BI-SF2022-00004	Date: 05/19/2022 Decedent: Rafael Mendoza and Michael MacFhionghain Agency: San Francisco Police Department Location: San Francisco, California Involved Officer: Aidan O'Driscoll, Daniel Rosaia, Trent Collins, and Joshua Dequis	Under Investigation
BI-SF2022-00003	Date: 05/19/2022 Decedent: Austin Flores Agency: Fresno Police Department Location: Fresno, California Involved Officer: Christopher Cooper	Under Investigation
BI-LA2022-00016	Date: 05/04/2022 Decedent: John Joseph Alaniz Agency: California Highway Patrol Location: Paramount, California Involved Officer: Ramon Silva	Under Investigation
BI-LA2022-00013	Date: 04/09/2022 Decedent: Daniel Luis Valdivia Agency: Covina Police Department Location: Covina, California Involved Officer: Vanessa Cardoza, David Meadows, and Billy Sun	Under Investigation

DOJ Case Number	Case Details	Status
BI-RI2022-00011	Date: 04/07/2022 Decedent: Travis Shane Tarrants Agency: Fontana Police Department Location: Fontana, California Involved Officer: Brandon Gossert, Johnsull Doakes, Joshua Nassar, Jociento DeLeon, and Leonard Sein	Under Investigation
BI-LA2022-00009	Date: 02/17/2022 Decedent: Pedro Morales Lopez Agency: Los Angeles County Sheriff's Department Location: Norwalk, California Involved Officer: Giovanni Lampignano	Under Investigation
BI-RI2022-00003	Date: 01/18/2022 Decedent: Joseph Thomas Tracy Agency: Riverside County Sheriff's Department, Hemet Police Department, and Riverside Police Department Location: Hemet, California Involved Officer: Chris Porrazzo, Josh Smith, Art Paez, and Richard Kerr	Under Investigation
BI-SF2022-00001	Date: 01/20/2022 Decedent: Nelson Szeto Agency: San Francisco Police Department Location: San Francisco, California Involved Officer: Steven Uang, Oliver Lim, David Wakayama, and Erik Whitney	Under Investigation
BI-LA2021-00036	Date: 12/23/2021 Decedent: Valentina Orellana Peralta and Daniel Abisai Elena Lopez Agency: Los Angeles Police Department Location: Los Angeles, California Involved Officer: William Jones	Under Investigation

DOJ Case Number	Case Details	Status
BI-SF2021-00013	Date: 12/10/2021 Decedent: Guadalupe Zavala Agency: Antioch Police Department Location: Antioch, California Involved Officer: Scott Duggar, Theodore Chang, Ryan McDonald, and Eric Rombough	Under Investigation
BI-RI2021-00023	Date: 07/26/2021 Decedent: Samuel Soto Agency: Los Angeles Police Department Location: Los Angeles, California Involved Officer: Eduardo Martinez and David Foci	Under Investigation
BI-LA2021-00019	Date: 08/09/2021 Decedent: Luis Manuel Garcia-Arias Agency: Tustin Police Department Location: Tustin, California Involved Officer: Estela Silva	Under Investigation
BI-RI2021-00024	Date: 08/07/2021 Decedent: Che Noe Zuniga Agency: Bakersfield Police Department Location: Bakersfield, California Involved Officer: Carson Puryear, Scott Mann, Joshua Pena, Chad Dickson, and Desmond Ramseur	Under Investigation

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Case Archive

Cases Previously Reviewed by the California Department of Justice

Pursuant to California Assembly Bill 1506 (AB 1506), the California Department of Justice is required to investigate all incidents of an officer-involved shooting resulting in the death of an unarmed civilian in the state. Historically, these critical incidents in California had been primarily handled by local law enforcement agencies and the state's 58 district attorneys. Cases where the California Department of Justice has completed its review under AB 1506 are listed below.

DOJ Case Number	Case Details	Status
BI-RI2021-00030	Date: 09/28/2021 Decedent: Brandon Anthony Lopez Agency: Anaheim Police Department Location: Santa Ana, California Involved Officer: Kenneth Weber, Brett Heitman, Catalin Panov, and Paul Delgado	Report Issued

DOJ Case Number	Case Details	Status
BI-LA2021-00027	Date: 09/28/2021 Decedent: Leonel Chavez Agency: California Highway Patrol Location: Los Angeles, California Involved Officer: Daniel Castaneda	Report Issued
BI-LA2021-00021	Date: 08/21/2021 Decedent: Juan Luis Olvera-Preciado Agency: Guadalupe Police Department Location: Guadalupe, California Involved Officer: Miguel Jaimes	Report Issued
BI-LA2021-00017	Date: 07/15/2021 Decedent: Matthew James Sova Agency: Los Angeles Police Department Location: Los Angeles, California Involved Officer: Christopher Tabela and Isaiah Galvez	Report Issued

EXHIBIT D

From: Sandra I. Alarcon
Sent: Thursday, October 19, 2023 1:42 PM
To: dalekgalipo@yahoo.com; jim@talktoterrell.com; sharonjbrunner@yahoo.com
Cc: Eugene P. Ramirez; Kayleigh Andersen; Lacey Sipsey
Subject: A.H., et al (PC) Meet-Confer Motion for Temporary Stay [900-59300]
Attachments: PC.001.Meet-Confer Motion for Temporary Stay Letter.Defts.101923.pdf

To All:

Please see attached Meet and Confer Letter Motion for Temporary Stay. Thank you.

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Re: **A.H., et al. v. County of San Bernardino, et al. – Case No. 5:23-cv-01028 Defendants' Motion to Stay**

Dear Counsel:

In accordance with Local Rule 7-3, we are writing to meet and confer with you prior to Defendants County of San Bernardino ("County") and Officer Justin Lopez ("Officer Lopez") (collectively, "Defendants") filing a motion for temporary stay of proceedings pending the California Department of Justice Investigation.

Defendants will move the Court for an Order temporary staying discovery against Defendant Officer Lopez. The grounds for this permitting civil discovery while a criminal investigation is pending would prejudice the individual officer defendants, who may be forced to choose between asserting their Fifth Amendment rights and being subjected to liability in the civil case.

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Dale K. Galipo, Esq.
James S. Terrell, Esq.
Sharon J. Brunner, Esq.

Re: Defendants' Motion to Stay

October 19, 2023

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First, absent a stay of discovery, it is highly likely that Defendant Officer Lopez's Fifth Amendment right against self-incrimination will be severely infringed.

Second, should Defendants be forced to begin producing information and records, that disclosure could put potential witnesses and suspects in danger and compromise the integrity of the CA DOJ investigation. This would result in a miscarriage of justice.

Third, given the pending nature of the CA DOJ investigation, any discovery pertaining to this incident would be the subject to the ongoing CA DOJ investigation, and thus privileged from disclosure under federal law.

Finally, Plaintiffs should not be prejudiced by a temporary, narrowly-drawn stay considering litigation can proceed against Defendant County.

The Court has inherent authority to stay any action within its jurisdiction. *Landis v. North American Co.*, 299 U.S. 248, 254 (1936). This power may be properly exercised in order to defer civil proceedings pending the outcome of related criminal proceedings whenever “the ends of justice seem to require such an action.” *United States v. Kordel*, 397 U.S. 1, 12, n.27 (1970). The Court will take into consideration the *Keating* factors to determine whether a stay of discovery and/or proceedings is warranted. *Keating v. Office of Thrift Supervision*, 45 F.3d 322, 324 (9th Cir.1995). These factors include:

- (1) the interest of the plaintiffs in proceeding expeditiously with this litigation or any particular aspect of it, and the potential prejudice to plaintiffs of a delay;
- (2) the burden which any particular aspect of the proceedings may impose on defendants;
- (3) the convenience of the court in the management of its cases, and the efficient use of judicial resources;
- (4) the interests of the public in the pending civil and criminal litigation.

Defendants fully meet the factors outlined above. Defendants believe the Court will grant this request given that the burden imposed upon Defendant Officer Lopez in regards to his Fifth Amendment rights greatly outweighs any potential prejudice to Plaintiffs.

For the reasons described above, Defendants respectfully request that Plaintiffs stipulate to a stay of discovery as related to Defendant Officer Lopez until the California Department of Justice investigation is complete. This will prevent the parties from unnecessarily litigating formal motions before the Court and wasting resources.

However, should Plaintiffs decline to stipulate to such a narrowly drawn stay, Defendants will move the Court for an Order in accordance with the request above.



Dale K. Galipo, Esq.
James S. Terrell, Esq.
Sharon J. Brunner, Esq.

Re: Defendants' Motion to Stay

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Please respond to this letter and let me know if Plaintiffs intend to stipulate to Defendants' request for a temporary stay. If Plaintiffs do not agree to stipulate to Defendants' request, please respond to this letter and advise when you are available to further discuss the issues raised herein as prescribed by L.R. 7-3.

Very truly yours,

MANNING | KASS

Kayleigh Andersen

Kayleigh Andersen, Esq.

KAA/Ins

EXHIBIT E

From: rvalentine@galipolaw.com
Sent: Thursday, October 26, 2023 8:52 AM
To: Kayleigh Andersen
Cc: Lacey Sipsey
Subject: RE: A.H., et al (PC) Meet-Confer Motion for Temporary Stay [900-59300]

Hi Kayleigh,

Thanks for reaching out. After checking with Dale, [REDACTED], but would not agree to a stay. [REDACTED].

Renee

From: Kayleigh Andersen <Kayleigh.Andersen@manningkass.com>
Sent: Thursday, October 26, 2023 8:21 AM
To: rvalentine@galipolaw.com
Cc: Lacey Sipsey <Lacey.Sipsey@manningkass.com>
Subject: FW: A.H., et al (PC) Meet-Confer Motion for Temporary Stay [900-59300]

Good morning Renee,

I see you were not on the original email with our meet and confer letter. I am hoping to speak with you either today or tomorrow about our anticipated motion to stay. Please let me know if you have any time in the next two days.

Thank you,
Kayleigh

Kayleigh Andersen

Partner



801 S. Figueroa St., 15th Floor
Los Angeles, CA 90017
Main: (213) 624-6900 | Ext.: 2447
Direct: (213) 553-2447

Kayleigh.Andersen@manningkass.com | manningkass.com

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From: Sandra I. Alarcon <Sandra.Alarcon@manningkass.com>
Sent: Thursday, October 19, 2023 1:42 PM

To: dalekgalipo@yahoo.com; jim@talktoterrell.com; sharonjbrunner@yahoo.com

Cc: Eugene P. Ramirez <Eugene.Ramirez@manningkass.com>; Kayleigh Andersen
<Kayleigh.Andersen@manningkass.com>; Lacey Sipsey <Lacey.Sipsey@manningkass.com>

Subject: A.H., et al (PC) Meet-Confer Motion for Temporary Stay [900-59300]

To All:

Please see attached Meet and Confer Letter Motion for Temporary Stay. Thank you.

Sandra I. Alarcon

Legal Assistant



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